

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

:

Plaintiff, : CASE NO. 1:19-cr-10080-NMG

vs. :

GAMAL ABDELAZIZ *et al.*, :

Defendants. :

MOTION FOR LEAVE TO APPEAR *PRO HAC VICE* FOR STEVEN MASERA

Philip Y. Kouyoumdjian, local counsel for Steven Masera, respectfully requests this Court grant David H. Thomas, lead counsel for Steven Masera, leave pursuant to L.R., D. Mass. 83.5.3 to appear *pro hac vice* for the limited purpose of opposing the Motion for Hearing on Invocation of Fifth Amendment Right filed by counsel for defendants Gamal Abdelaziz and John Wilson in the above-captioned matter. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted,
Taft Stettinius & Hollister LLP

/s/ **Philip Y. Kouyoumdjian**
PHILIP Y. KOUYOUMDJIAN
Massachusetts Bar No. 633443
14 Penn Plaza
225 West 34th Street, Suite 2102
New York, NY 10122
P: (917) 534-7180
F: (312) 966-8555
pkouyoumdjian@taftlaw.com

Local Counsel for Steven Masera

MEMORANDUM

Steven Masera has been subpoenaed in the above-captioned matter by defendants Gamal Abdelaziz and John Wilson. Philip Y. Kouyoumdjian, local counsel for Steven Masera, is before this Court requesting leave for lead counsel for Steven Masera, David H. Thomas, to appear *pro hac vice* in this matter, as he has not been admitted to the Bar of the Court. Philip Y. Kouyoumdjian, a member of the bar of this Court, will serve as local counsel pursuant to L.R.. 83.5.3(e)(2). Pursuant to L.R. 83.5.3(e)(4), the *pro hac vice* admission fee has been paid to the Clerk of Court. Attached to this Motion as Exhibit A is a certification from David H. Thomas certifying that he is a member of good standing in every jurisdiction in which he has been admitted to practice and is not the subject of disciplinary proceedings pending in any jurisdiction in which he is a member of the bar. L.R. 83.5.3(e)(3)(A), (B). Further, Exhibit A certifies David H. Thomas has not previously had a *pro hac vice* admission to this Court revoked for misconduct and that he has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts. L.R. 83.5.3(e)(3)(C), (D).

Undersigned counsel respectfully requests this Court grant David H. Thomas leave to appear *pro hac vice* as lead counsel for Steven Masera in this matter.

Respectfully submitted,
Taft Stettinius & Hollister LLP

/s/ **Philip Y. Kouyoumdjian**
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Massachusetts Bar No. 633443
14 Penn Plaza
225 West 34th Street, Suite 2102
New York, NY 10122
P: (917) 534-7180
F: (312) 966-8555
pkouyoumdjian@taftlaw.com

Local Counsel for Steven Masera

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Court for the United States District Court for the District of Massachusetts using the CM/ECF system on September 28, 2021, which will send notification of such filings by electronic means to all registered participants as identified on the Notice of Electronic filing.

/s/ Philip Y. Kouyoumdjian
PHILIP Y. KOUYOUMDJIAN